

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANDREA TANTAROS

Plaintiff,

V.

FOX NEWS NETWORK, LLC, ROGER
AILES, WILLIAM SHINE, IRENA
BRIGANTI, PETER A. SNYDER,
DISRUPTOR, INC., and JOHN DOES 1-50.

Defendants.

Case No. 17-cv-02958 (GBD)

DECLARATION OF RANDY M. MASTRO IN FURTHER SUPPORT OF DEFENDANTS PETER A. SNYDER AND DISRUPTOR, INC.'S MOTION SEEKING SANCTIONS PURSUANT TO RULE 11

I, Randy M. Mastro, hereby declare as follows:

1. I am a member of the bar of this Court and a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel to Defendants Peter A. Snyder and Disruptor, Inc. (collectively, the “Moving Defendants”). I submit this declaration in support of the Moving Defendants’ Motion Seeking Sanctions Pursuant to Federal Rule of Civil Procedure 11.

2. Attached as Exhibit 1 is a true and correct copy of an article titled *Fmr Fox News Host Andrea Tantaros Sues After Alleged Defamatory Tweet About On-Air Talent Brawl*, originally published in Law Newz on April 20, 2017.

3. Attached as Exhibit 2 is a true and correct copy of an article titled *Former Fox News Host Alleges Network Operatives Hacked Her Phone As Part of Smear Campaign*, originally published in New York Magazine on April 24, 2017.

4. Attached as Exhibit 3 is a true and correct copy of an article titled *Ex-Host Claims Fox News Hacked Her, Used Info to ‘Emotionally Torture’ Her Online*, originally published in the Daily Beast on April 24, 2017.

5. Attached as Exhibit 4 is a true and correct copy of an article titled *The Widening Blast Radius of the Fox News Scandal*, originally published in Politico on May 14, 2017.

6. Attached as Exhibit 5 is a true and correct copy of an article titled *Fox News Alleged to Have Paid "Astronomical" Sum to Launch Cyberattacks*, originally published in the Hollywood Reporter on August 11, 2017.

7. Attached as Exhibit 6 is a true and correct copy of an article titled *Ex-Fox News Host Andrea Tantaros Claims Network Paid On-Air Contributor to Cyberbully Her*, originally published in the Wrap on August 11, 2017.

8. Attached as Exhibit 7 is a true and correct copy of an article titled *Andrea Tantaros Claims Fox News "Tortured" Her Via Hacking, Social Media Stalking*, originally published in the Hollywood Reporter on April 24, 2017.

9. Attached as Exhibit 8 is a true and correct copy of an article titled *If Fox News Has a Social Media Sock Puppeteer, Does he Gain Benefit of Arbitration?*, originally published in the Hollywood Reporter on June 21, 2017.

I hereby declare, under penalty of perjury, that the foregoing is true and correct.

Dated: New York, New York
September 1, 2017

/s/ Randy M. Mastro
Randy M. Mastro